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## November 9, 2020

# **By ECF**

The Hon. Lewis J. Liman United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

#### Novellibel 9, 202

**GRANTED.** 

The Court grants the 30 day extension to deadlines as proposed. The Pretrial Conference previously set for December 3, 2020 is canceled and Oral Argument is scheduled for January 20, 2021 at 12:00PM. The Court excludes time from November 9, 2020 to January 20, 2021, under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A) upon the finding that the interests of justice outweigh the interests of the public and the defendant in a speedy trial in that the time until January 20, 2021 is necessary for the parties to continue discussions with respect to a potential disposition and for the defendant to brief potential pretrial motions.

Re: United States v. Paul Thompson 19 Cr. 056 (LJL)

11/9/2020 SO ORDERED.

> LEWS J. LIMAN United States District Judge

Dear Judge Liman:

I represent Defendant Paul Thompson in the above-referenced matter and write to respectfully request a 30-day extension of time to file pretrial motions in this case, as well as a similar extension of time for the Government to file its response and the defense to submit its reply, if any, at such time. Defendant also requests that oral argument on said motions, presently scheduled for December 3, 2020, at 9:00 a.m., be similarly adjourned to a date in January 2021 that is convenient to the Court.

The instant application is being made because pretrial motions are currently due today, but discussions regarding a potential pretrial disposition remain active and the parties are in agreement that plea negotiations could be benefited by an adjournment of the filing of motions.

According, Defendant Paul Thompson, by and through counsel, respectfully requests a 30-day extension of the pretrial filing deadlines in this case setting new deadlines as follows:

Pretrial Motions due: December 9, 2020 Response due: December 23, 2020 Reply (if any) due: December 30, 2020

Oral argument: TBD (at a time convenient to the Court)

I have spoken with Assistant United States Attorney David Robles and he has informed me that the Government has no objection to the instant application.

Thank you for your time and consideration.

Respectfully submitted,

/S/

Michael K. Bachrach Attorney for Defendant Paul Thompson

cc: AUSA David Robles (by ECF)